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#### UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

YOLANY PADILLA, IBIS GUZMAN, **BLANCA** ORANTES, BALTAZAR VASQUEZ,

Plaintiffs-Petitioners,

v.

U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT ("ICE"); U.S. DEPARTMENT OF HOMELAND SECURITY ("DHS"); U.S. CUSTOMS AND BORDER PROTECTION ("CBP"); U.S. CITIZENSHIP IMMIGRATION SERVICES ("USCIS"); EXECUTIVE OFFICE FOR IMMIGRATION REVIEW ("EOIR"); MATTHEW ALBENCE, Acting Director of ICE; KEVIN MCALEENAN, Acting Secretary of DHS; MARK Commissioner of CBP; MORGAN, Acting CUCCINELLI, Acting Director of USCIS; MARC J. MOORE, Seattle Field Office Director, ICE, WILLIAM BARR, United States Attorney General; LOWELL CLARK, warden of the Northwest Detention Center in Tacoma, Washington; CHARLES INGRAM, warden of the Federal Detention Center in SeaTac, Washington; DAVID SHINN, warden of the Federal Correctional Institute in Victorville, California; JAMES JANECKA, warden of the Adelanto Detention Facility;

Defendants-Respondents.

No. 2:18-cv-928 MJP

JOINT STATUS REPORT AND [PROPOSED] **ORDER FOR FURTHER** STATUS REPORTS

NOTE ON MOTION CALENDAR: SEPTEMBER 2, 2022.

The parties hereby respond to this Court's order of July 29, 2022 (ECF no. 183), and advise

the following.

The parties have discussed the next steps in this litigation over email and over the phone, and those discussion continue. The parties have concluded that exploring settlement of the credible fear claims in this case may be fruitful at this time. The parties are planning to have a preliminary settlement discussion before determining whether this matter should be referred to mediation. Thus, the parties request that this Court set a deadline to provide a further status report to the Court

JOINT STATUS REPORT AND STIPULATION AND [PROPOSED] ORDER FOR **FURTHER STATUS** REPORTS

CASE No. 2:18-cv-928 MJP

U.S. Department of Justice, Civil Division Office of Immigration Litigation, District Court Section PO Box 868, Ben Franklin Station Washington, DC 20044 Telephone (202) 616-4458

1	in four weeks (to and including Friday, September 30, 2022) so they can propose a path forward			
2	for settlement discussions or propose the next steps for the litigation. Accordingly, the parties have			
3	attached a proposed order to that effect.			
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JOINT STATUS REPORT AND STIPULATION AND [PROPOSED] ORDER FOR FURTHER STATUS REPORTS - 2

CASE No. 2:18-cv-928 MJP

1	RESPECTFULLY SUBMITTED this 2nd day of	of September, 2022.
2	s/ Matt Adams	Trina Realmuto*
2	Matt Adams, WSBA No. 28287	Kristin Macleod-Ball *
3	Email: matt@nwirp.org	NAME OF THE OWNER OWNER OF THE OWNER OW
4	Aaron Korthuis, WSBA No. 53974	NATIONAL IMMIGRATION LITIGATION ALLIANCE
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14		*Admitted pro hac vice
15		-
16		
17		
18	DRIANIM DOVATONI	/v/I w we C Divel www
19	BRIAN M. BOYNTON  Principal Deputy Assistant Attorney General	<u>/s/ Lauren C. Bingham</u> LAUREN C. BINGHAM, Fl. Bar #105745
19	Civil Division	Senior Litigation Counsel,
20		District Court Section
21	WILLIAM C. PEACHEY	Office of Immigration Litigation
21	Director, District Court Section	Civil Division
22	Office of Immigration Litigation	P.O. Box 868, Ben Franklin Station Washington, DC 20044
23	EREZ REUVENI	(202) 616-4458; (202) 305-7000 (fax)
24	Assistant Director, District Court Section Office of Immigration Litigation	lauren.c.bingham@usdoj.gov
25	SARAH S. WILSON	
26	Assistant Director, Appellate Section	Attorneys for Defendants-Respondents
	JOINT STATUS REPORT AND STIPULATION AND IPROPOSEDLORDER FOR	U.S. Department of Justice, Civil Division Office of Immigration Litigation, District Court Section PO Box 868, Ben Franklin Station

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[PROPOSED] ORDER FOR

FURTHER STATUS REPORTS - 3

CASE No. 2:18-cv-928 MJP

### [PROPOSED] ORDER

Based on the foregoing stipulation of the parties, IT IS SO ORDERED. The parties are required to submit a further status report on or before Friday, September 30, 2022 to propose a path forward for settlement discussions or propose the next steps for the litigation

DATED this \_\_\_\_ day of September, 2022.

THE HONORABLE MARSHA J. PECHMAN UNITED STATES DISTRICT JUDGE

JOINT STATUS REPORT AND STIPULATION AND [PROPOSED] ORDER FOR FURTHER STATUS REPORTS - 4 U.S. Department of Justice, Civil Division Office of Immigration Litigation, District Court Section PO Box 868, Ben Franklin Station Washington, DC 20044 Telephone (202) 616-4458

CASE No. 2:18-cv-928 MJP

#### **CERTIFICATE OF SERVICE**

I hereby certify that on September 2, 2022, I had the foregoing electronically filed with the
Clerk of the Court using the CM/ECF system, which will send notification of such filing to those
attorneys of record registered on the CM/ECF system. All other parties (if any) shall be served in
accordance with the Federal Rules of Civil Procedure.

/s/ Sarah Wilson SARAH WILSON Assistant Director

Attorney for Defendants-Respondents

Assistant Director

JOINT STATUS REPORT AND STIPULATION AND [PROPOSED] ORDER FOR FURTHER STATUS REPORTS - 5

CASE No. 2:18-cv-928 MJP

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